

## Exhibit 3

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION MDL No. 2804  
OPIATE LITIGATION

Case No.  
17-md-2804

Judge Dan Aaron  
Polster

This document relates to:  
The County of Summit, Ohio, et al. v. Purdue  
Pharma L.P., et al.

Case No. 18-OP-45090 (N.D. Ohio)

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Videotaped Deposition of

KENNETH R. BALL II

November 7, 2018  
9:04 a.m.

Taken at:

Hilton Garden Inn  
1307 East Market Street  
Akron, Ohio

Stephen J. DeBacco, RPR

1 APPEARANCES:

2  
3 On behalf of the City of Akron, Summit  
4 County, and the Witness:

5 Motley Rice LLC, by  
6 JAMES W. LEDLIE, ESQ.  
7 CAROLINE RION, ESQ.  
8 28 Bridgeside Boulevard  
9 Mt. Pleasant, South Carolina 29464  
(843) 216-9252  
jledlie@motleyrice.com  
(843) 216-9168  
crion@motleyrice.com

10 On behalf of McKesson Corporation:

11 Covington & Burling, by  
12 JENNIFER SAULINO, ESQ.  
13 One CityCenter  
14 850 Tenth Street Northwest  
Washington, D.C. 20001-4956  
(202) 662-5305  
jsaulino@cov.com

15 -and-

16 Covington & Burling, by  
17 STEPHEN F. RAIOLA, ESQ.  
18 One CityCenter  
19 850 Tenth Street Northwest  
Washington D.C., 20001-4956  
202-662-5786  
sraiola@cov.com

20 ~ ~ ~ ~ ~  
21  
22  
23  
24  
25

1 APPEARANCES, Continued:

2 On behalf of Johnson & Johnson and  
3 Janssen Pharmaceuticals, Inc.:

4 Tucker Ellis, LLP, by  
5 BRENDA A. SWEET, ESQ.  
6 950 North Main Avenue, Suite 1100  
7 Cleveland, Ohio 44113  
8 (216) 696-2493  
9 brenda.sweet@tuckerellis.com

10 On behalf of Endo Health Solutions, Inc.,  
11 and Endo Pharmaceuticals, Inc., via  
12 Teleconference:

13 Baker Hostetler, by  
14 TERA N. COLEMAN, ESQ.  
15 Key Tower  
16 127 Public Square, Suite 2000  
17 Cleveland, Ohio 44114-1214  
18 (216) 861-7582  
19 tcoleman@bakerlaw.com

20 On behalf of Prescription Supply, Inc.:  
21 Pelini, Campbell & Williams, by  
22 KRISTEN E. CAMPBELL TRAUB, ESQ.  
23 Bretton Commons, Suite 400  
24 8040 Cleveland Avenue Northwest  
25 North Canton, Ohio 44720  
(330) 305-6400  
kec@pelini-law.com

On behalf of Walmart, Inc.:

Jones Day, by  
LISA B. GATES, ESQ.  
901 Lakeside Avenue  
Cleveland, Ohio 44114-1190  
(212) 586-7154  
lgates@jonesday.com

~ ~ ~ ~ ~

1 APPEARANCES, Continued:

2 On behalf of Walgreens:

3 Bartlit Beck LLP, by  
4 MATTHEW BREWER, ESQ.  
5 54 West Hubbard Street  
6 Chicago, Illinois 60654  
7 (312) 494-4432  
8 batthew.brewer@bartlitbeck.com

9 On behalf of Allergan Finance, LLC, via  
10 Veritext Virtual:

11 Kirkland & Ellis LLP, by  
12 TUCKER HUNTER, ESQ.  
13 300 North LaSalle  
14 Chicago, Illinois 60654  
15 (312) 862-3758  
16 tucker.hunter@kirkland.com

17 On behalf of Cardinal Health, Inc.:

18 Williams & Connolly LLP, by  
19 MIRANDA PETERSEN, ESQ.  
20 725 12th Street Northwest  
21 Washington, D.C. 20005  
22 (202) 434-5686  
23 mpetersen@wc.com

24 On behalf Endo Health Solutions, Inc.,  
25 and Endo Pharmaceuticals, Inc.:

Arnold & Porter, by  
JOHN D. LOMBARDO, ESQ.  
777 South Figueroa Street  
44th Floor  
Los Angeles, California 90017-5844  
john.lombardo@arnoldporter.com

~ ~ ~ ~ ~

1 APPEARANCES, Continued:

2  
3 On behalf of AmerisourceBergen, via  
4 Teleconference:

5 Reed Smith, LLP, by  
6 NICHOLAS R. RODRIGUEZ, ESQ.  
7 Three Logan Square  
8 1717 Arch Street, Suite 3100  
9 Philadelphia, Pennsylvania 19103  
10 (215) 241 7947  
11 nrodriguez@reedsmith.com

12 ~ ~ ~ ~ ~

13 ALSO PRESENT:

14 Richard Hand, Morgan, Lewis &  
15 Bockius, via Teleconference

16  
17 Shaun Crum, Legal Videographer

18 ~ ~ ~ ~ ~

TRANSCRIPT INDEX

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

APPEARANCES.....	2
INDEX OF EXHIBITS .....	7
EXAMINATION OF KENNETH R. BALL II	
By Ms. Saulino.....	15
By Mr. Lombardo.....	331
By Mr. Ledlie:.....	368
By Ms. Saulino.....	375
REPORTER'S CERTIFICATE.....	385
EXHIBIT CUSTODY	
EXHIBITS RETAINED BY THE COURT REPORTER	

1 the question.

2 A. That could happen.

3 Q. Okay. So it's -- I think, as you  
4 said, certainly plausible that individuals who  
5 end up overdosing on an opioid never intended  
6 to take one, right?

7 MR. LEDLIE: Object to the form of  
8 the question.

9 A. That could be the case.

10 Q. All right. We've talked about the  
11 opioid epidemic and your understanding of it.

12 Do you believe that Akron faces a  
13 prescription opioid epidemic?

14 MR. LEDLIE: Object to the form of  
15 the question.

16 A. I do.

17 Q. And when did that prescription  
18 opioid epidemic begin, in your opinion?

19 A. I believe that it -- that it  
20 started in -- like I had mentioned before, in  
21 the late '90s when we started to see a  
22 significant number of -- of reports and other  
23 interactions that suggested that.

24 - - - - -

25 (Thereupon, Deposition Exhibit 6,



1 because they're computer-generated reports.

2 Q. Do you recall discussing, with your  
3 leadership at the time, that you were seeing  
4 these increases?

5 MR. LEDLIE: Object to the form of  
6 the question.

7 A. I don't recall specifically. I do  
8 know that there was a change in -- in awareness  
9 about -- hadn't heard of OxyContin. Hear of  
10 OxyContin, and then start to see another  
11 report, another report, another report, and,  
12 you know, Percocet and some of the other  
13 prescription medications, then, that were  
14 frequently being reported as stolen or stolen,  
15 it stood out.

16 Q. Right. And I -- and I just want to  
17 understand. I know it stood out to you. Are  
18 you aware that it stood out to others as well?

19 A. Through -- yes. I mean, through  
20 casual conversations that I wouldn't be able to  
21 pinpoint, you know, "I spoke to Sergeant  
22 Jones," you know, "on this date about it."  
23 But, yes, there was a growing familiarity  
24 within the department that that was  
25 problematic.

1 Q. Starting in the late 1990s?

2 A. I think so.

3 Q. Okay. Have you ever sought a  
4 budget allowance specific to anything caused by  
5 opioids?

6 A. Can you restate that?

7 Q. Sure. Have you ever -- have you  
8 ever asked for any kind of a specific budget  
9 allowance related to opioids in any way?

10 MR. LEDLIE: Object to the form.

11 A. No, other than people resources,  
12 I've not had a financial request.

13 Q. You say "other than people  
14 resources." Have you asked for specific people  
15 resources related to opioids?

16 A. Yes.

17 Q. Tell me about that.

18 A. The first two -- this wasn't me  
19 asking at that point in time, but the -- the  
20 first two detectives that were dedicated, they  
21 were taking from our -- taken from our  
22 narcotics or bid, in addition to our current --  
23 the staffing at that time for narcotics, two  
24 positions for opioid death investigations.

25 Then there was another point that